

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SOLAR BIOTECH, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11402 (LSS)
(Jointly Administered)

Related to Docket Nos. 503, 506

**DECLARATION OF EMILY YOUNG, ON BEHALF OF
EPIQ CORPORATE RESTRUCTURING, LLC, REGARDING SOLICITATION AND
TABULATION OF BALLOTS CAST ON FIRST AMENDED COMBINED
DISCLOSURE STATEMENT AND CHAPTER 11 PLAN OF LIQUIDATION OF
SOLAR BIOTECH, INC. AND ITS DEBTOR AFFILIATE**

I, Emily Young, hereby declare as follows under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a Director of Epiq Corporate Restructuring, LLC (“Epiq”) located at 777 Third Avenue, 12th Floor, New York, New York 10017. I am over the age of 18 years and am not a party to the above-captioned action. I do not have a direct interest in the above-captioned chapter 11 cases and should be considered impartial.

2. I submit this declaration (the “Declaration”) with respect to the solicitation and tabulation of votes cast on the *First Amended Combined Disclosure Statement and Chapter 11 Plan of Liquidation of Solar Biotech, Inc. and its Debtor Affiliate* [Docket No. 506] (as may be amended, supplemented or modified from time to time, the “Plan”).² Except as otherwise indicated herein, all facts set forth herein are based upon my personal knowledge or my review of relevant

¹ The Debtors in these Chapter 11 Cases are Solar Biotech, Inc. and Noblegen Inc. The location of Debtors’ principal place of business is 5516 Industrial Park Rd, Norton, VA 24273, Attn: Alex Berlin.

² Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Plan or the Solicitation Procedures Order (as defined herein).

documents. I am authorized to submit this Declaration on behalf of Epiq. If I were called upon to testify, I could and would testify competently as to the facts set forth herein.

3. In accordance with the (a) *Order Authorizing the Debtors to Retain and Employ Epiq Corporate Restructuring, LLC as Administrative Advisor Effective as of November 6, 2024* [Docket No. 366] and (b) *Order (I) Approving the First Amended Combined Disclosure Statement and Plan on an Interim Basis for Solicitation Purposes Only; (II) Establishing Solicitation and Tabulation Procedures; (III) Approving the Form of Ballot and Solicitation Materials; (IV) Establishing the Voting Record Date; (V) Fixing the Date, Time, and Place for the Combined Hearing and the Deadline for Filing Objections Related Thereto; (VI) Establishing an Administrative Claims Bar Date and (VII) Granting Related Relief* [Docket No. 503] (the “Solicitation Procedures Order”), Epiq was appointed as the Debtors’ solicitation agent and authorized to assist the Debtors with, *inter alia*, soliciting, receiving, reviewing, determining the validity of and tabulating Ballots cast on the Plan by Holders of Claims in the Voting Classes (as defined herein). Epiq and its employees have considerable experience in soliciting and tabulating votes to accept or reject proposed chapter 11 plans.

4. As set forth in the Solicitation Procedures Order, the Debtors established July 24, 2025 as the record date (the “Voting Record Date”) for determining which Holders of Claims in the Voting Classes were entitled to vote on the Plan. Under the Plan, only Holders of Claims in the following Classes (the “Voting Classes”) were entitled to vote to accept or reject the Plan:

<u>Class</u>	<u>Description</u>
Class 1	Compromised Ingredion Secured Claim
Class 1A	Wise County Secured Claim
Class 3	General Unsecured Claims

5. The procedures for the solicitation and tabulation of votes on the Plan (the “Solicitation Procedures”) are outlined in the Solicitation Procedures Order. Epiq was instructed by the Debtors to solicit, review, determine the validity of and tabulate Ballots submitted with respect to the Plan by the Holders of Claims in the Voting Classes in accordance with the Solicitation Procedures. In addition, Epiq consulted with the Debtors and their counsel, as appropriate, to ensure compliance with the Solicitation Procedures. I supervised the solicitation and tabulation performed by Epiq’s employees.

6. On July 28, 2025, Epiq completed service of the Confirmation Hearing Notice on all parties in interest, Solicitation Packages on the Holders of Claims in the Voting Class, and Non-Voting Notice Packages on Holders of Claims in the Non-Voting Classes. Epiq’s *Amended Certificate of Service of Solicitation Documents* was filed on August 14, 2025 [Docket No. 520].

7. Each Ballot received by Epiq was date-stamped upon receipt, assigned a ballot number, entered into Epiq’s voting database and processed in accordance with the Solicitation Procedures Order.

8. Epiq received, reviewed, determined the validity of and tabulated the Ballots submitted to vote on the Plan. In order for a Ballot to be counted as valid, the Ballot must have been (a) properly completed in accordance with the Solicitation Procedures, (b) executed by the relevant holder or such holder’s authorized representative, (c) returned to Epiq via an approved method of delivery as set forth in the Solicitation Procedures, and (d) received by Epiq by no later than 4:00 p.m. (prevailing Eastern Time) on August 25, 2025 (the “Voting Deadline”).

9. All validly executed Ballots cast by Holders of Claims in the Voting Classes received by Epiq on or before the Voting Deadline were tabulated as outlined in the Solicitation Procedures. A true and correct copy of the final tabulation of the votes cast by Holders of Claims

in the Voting Classes through timely and properly completed Ballots received by Epiq on or before the Voting Deadline is attached hereto as **Exhibit A.**

10. No Ballots were excluded from the tabulation results in Exhibit A.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge, information, and belief.

Dated: September 4, 2025

/s/ *Emily Young*

Emily Young

Director

Epiq Corporate Restructuring, LLC

EXHIBIT A**Tabulation Summary**

TOTAL BALLOTS COUNTED					Class Voting Result	
VOTING CLASS	ACCEPT		REJECT			
	AMOUNT	NUMBER	AMOUNT	NUMBER		
Class 1						
Compromised Ingredion Secured Claim	\$7,595,613.87 100.00%	1 100.00%	\$0.00 0.00%	0 0.00%	Accept	
Class 1A						
Wise County Secured Claim	\$7,256.84 100.00%	1 100.00%	\$0.00 0.00%	0 0.00%	Accept	
Class 3						
General Unsecured Claims	\$1,793,935.00 100.00%	9 100.00%	\$0.00 0.00%	0 0.00%	Accept	